



ArentFox Schiff LLP

1301 Avenue of the Americas
42nd Floor
New York, NY 10019

212.484.3900 **MAIN**
212.484.3990 **FAX**

afslaw.com

Eric Roman

Partner
212.492.3283 **DIRECT**
eric.roman@afslaw.com

September 11, 2024

Hon. Joseph A. Marutollo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *McMaster-Carr Supply Company v. Buy Supply Corp.* (24-cv-05004-JAM)
Request for adjournment of initial conference**

Dear Hon. Judge Marutollo:

We represent the Plaintiff McMaster-Carr Supply Company (“McMaster-Carr”). We request an adjournment of the deadline for joint submission of the parties’ proposed discovery schedule, currently set for September 13, 2024, to October 14, 2024. We also request an adjournment of the initial conference, presently set for September 20, 2024, to October 21, 2024. This is McMaster-Carr’s first request for an adjournment of either date.

On July 18, 2024, McMaster-Carr commenced this action by filing a complaint against Defendant Buy Supply Corp. (the “Defendant”). On the same date, McMaster-Carr sent Defendant a request to waive service under Rule 4 of the Federal Rules of Civil Procedure. The deadline for Defendant to respond to the request for waiver is Monday, September 16, 2024. As a result, McMaster-Carr has not yet served Defendant. If Defendant fails to return the waiver of service by September 16, McMaster-Carr will immediately proceed with serving the complaint on Defendant. In the meantime, McMaster-Carr has been in contact with Defendant and has been attempting to negotiate a settlement of the action.

Under the current schedule, the parties are required to appear for an initial conference on September 20, 2024, and must submit a joint proposed discovery schedule to the Court by this Friday, September 13, 2024. McMaster-Carr respectfully requests that the Court adjourn the initial conference and the deadline for the joint discovery schedule requirement by about 30 days, to October 14, 2024, and October 21, 2024, respectively. This will allow McMaster-Carr sufficient time to obtain Defendant’s waiver of service, serve Defendant with the complaint, or negotiate a settlement of the action.

We thank the Court for its consideration of this request.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "E. Roman", with a stylized flourish at the end.

Eric Roman

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